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NAWC WARMINSTER
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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
841 Chestnut Building
Philadelphia, Pennsylvania 19107-4431

APR 17 1995

Mr. Thomas Ames (87D00R14)
BRAC Environmental Coordinator
Naval Air Warfare Center
Warminster, Pennsylvania 18974

Mr. Orlando Monaco
Naval Facilities Engineering Command
Environmental Contracts Branch
10 Industrial Highway
Lester, Pennsylvania 19113

Re: Naval Air Warfare Center (NAWC)

Dear Mr. Ames and Mr. Monaco:

This letter regards Remedial Investigation (RI), Remedial Design (RD) and Interim Remedial Action (RA) work by the Navy addressing contaminated groundwater attributable to Area A at NAWC. Several of the major comments in this regard were discussed at a meeting of the BRAC Cleanup Team on April 11, 1995. In addition, this letter follows up on previous EPA comments regarding a schedule for the RA work and potential radioactive waste or materials at NAWC.

CONTAMINATED GROUNDWATER ATTRIBUTABLE TO AREA A

As you are aware, an interim Remedial Action (RA) for contaminated groundwater attributable to Area A (Operable Unit One or OU-1) was selected by the Navy and EPA in a Record of Decision (ROD) dated September 29, 1993. The subject ROD included the pumping and treatment of contaminated groundwater attributable to Area A to minimize the migration of this groundwater while additional RI studies were completed to determine the full nature and extent of this groundwater. In a letter dated July 6, 1994, EPA "approved" an RD for OU-1 on the condition that "the Navy should initiate the operation of the treatment and extraction system only upon completion of additional Remedial Design (RD) documents which assure that Performance Standards for Groundwater Extraction Wells will be met." Since that time, the Navy has established a Technical Evaluation Group to develop recommendations for the Navy regarding these extraction wells. In addition, to determine the

full nature and extent of groundwater contamination attributable to Area A, the Navy proposed offbase monitoring wells downgradient of Area A in a letter to EPA dated November 17, 1994 (see Attachment 1 for a map of the subject locations).

Based upon the letter of November 17 and subsequent meetings of the Technical Subcommittee of the Restoration Advisory Board for NAWC, the Navy and EPA agreed that the proposed offbase monitoring well clusters (MW Clusters) should be installed and sampled as proposed. In addition, EPA has also requested that an additional onbase monitoring well cluster (hereafter referred to as HN-55) be installed within Area A in the vicinity of the location indicated on Attachment 2. (EPA is currently awaiting the proposed location and construction details for this additional MW cluster from the Navy).

Out of the six offbase MW Clusters of concern, only two (HN-15 X,S,I,D and HN-16 S,I,D) have been installed and sampled to date. According to the Navy, the installation and sampling of the additional offbase MW Clusters HN-50 S,I,D and HN-52 S,I,D has been delayed by property access problems, while HN-14 X,S,I has been delayed until the Navy connects Wagner & Son, a food processor who owns the subject property, to a public water supply. The process of obtaining access to these properties and connecting Wagner & Son to public water has now extended to almost 5 months.

Please be aware that further delays may impact the schedule for initiating the extraction of groundwater under the Interim RA for OU-1. As discussed, MW Clusters HN-14 X,S,I, HN-52 S,I,D and HN-55 must be installed and sampling results evaluated prior to completing the RD for the initial extraction well network. This data must be evaluated to "ensure that the extraction system does not adversely affect nearby industrial, commercial, municipal or residential wells" and to "ensure that the extraction well design and the aquifer's response to pumping does not provide a means of moving the plume into previously uncontaminated portions of the aquifer". (EPA requested that these objectives be included in the RD for OU-1 in a letter to the Navy dated July 6, 1994.)

As discussed, while the actual location of extraction wells to be installed and operated under the interim RA for OU-1 cannot be identified at this time, based on available data (including analytical data for Well Cluster HN-16), it is clear that this network should extend at least 500 feet downgradient of Area A. As a result, access to offbase properties for the purpose of extraction well construction, operation and maintenance will be necessary. The offbase properties of potential concern in this case include those owned and/or operated by Wagner & Son, NASCO, and CRC. Based on the problems encountered to date with regard to property access for monitoring well installation, the Navy should

initiate the process of obtaining access to these properties, and any other potential properties of concern, at this time.

In addition, as discussed, to ensure that installation and/or operation of any of the monitoring or extraction wells to address OU-1 does not adversely affect the nearby well users, the Navy should obtain information from Warminster Township Municipal Authority (WTMA) regarding the treatment capacity in place for WTMA Well No.26. While the water from Well No.26 is currently being treated by WTMA, the Navy should conduct any response actions necessary to ensure that any contaminant levels attributable to Area A in Well No. 26 due to the installation or operation of these wells does not present a threat to human health. The Navy should take similar measures as necessary to protect other well users in the area (e.g. Aztec Machinery) in this regard.

SCHEDULE FOR RA FOR OU-1

In response to Section XVIII of a Federal Facility Agreement (FFA) for NAWC signed by the EPA and the Navy on September 20, 1990, the Navy has submitted an undated RA Work Plan for OU-1 to EPA. In apparent response to Section XVIII.8, which states that the RA Workplan shall "contain a proposed schedule for the completion of the Remedial Action", the submitted RA Workplan indicated that the "current schedule" for the subject construction work "will be posted in the office of the NAWC BRAC Cleanup Team (BCT)" and that "copies of the schedule will be provided to EPA and other interested parties on a bi-weekly basis". In a letter dated March 30, EPA indicated that the schedule in the office of the BCT has not been updated since construction work began in early January 1995 and requested an updated schedule in the next meeting of the BCT. Since this letter, no updated schedule has been provided at two BCT meetings and no explanation offered.

In addition to disregarding the FFA, this situation reflects a lack of coordination between the BCT and Navy response action personnel which may ultimately have a negative effect on the timely transfer of NAWC property to the community. Once again, please provide EPA and other interested parties updates to the schedule of concern as indicated in the RA Workplan. The next schedule update should be provided in time for EPA to comment on the Navy's strategy regarding RI work within the pathway of a pipeline to be constructed through Area A under the RA for OU-1.

RADIOACTIVE WASTE AND MATERIAL

In a letter dated October 18, 1994, regarding a Draft Phase III RI Workplan, EPA requested the Navy to provide background

information regarding radioactive wastes that may have been generated by NAWC. To date, the requested information has not been provided. In addition, in a letter dated January 17, 1995, EPA requested that the Draft Basewide Environmental Survey Report be revised to include information regarding the use, storage and disposal of radioactive materials at NAWC. A subsequent revised Basewide EBS received by EPA does not include this information.

Without the requested information, EPA cannot comment on the effectiveness of any monitoring for radioactive waste proposed by the Navy as part of CERCLA work at NAWC and cannot confirm that NAWC property does not present potential risk to future property owners.

As a first step in remedying this situation, EPA suggests the Navy conduct a study addressing NAWC similar to the "Radiological Survey for Landfill and Buildings, Naval Complex, Philadelphia, PA, Task 1 - Historical Investigation" prepared for NORTHDIV and dated March 31, 1995. This type of study should be conducted as soon as possible.

Should you have any questions or comments regarding the above, please give me a call.

Sincerely,

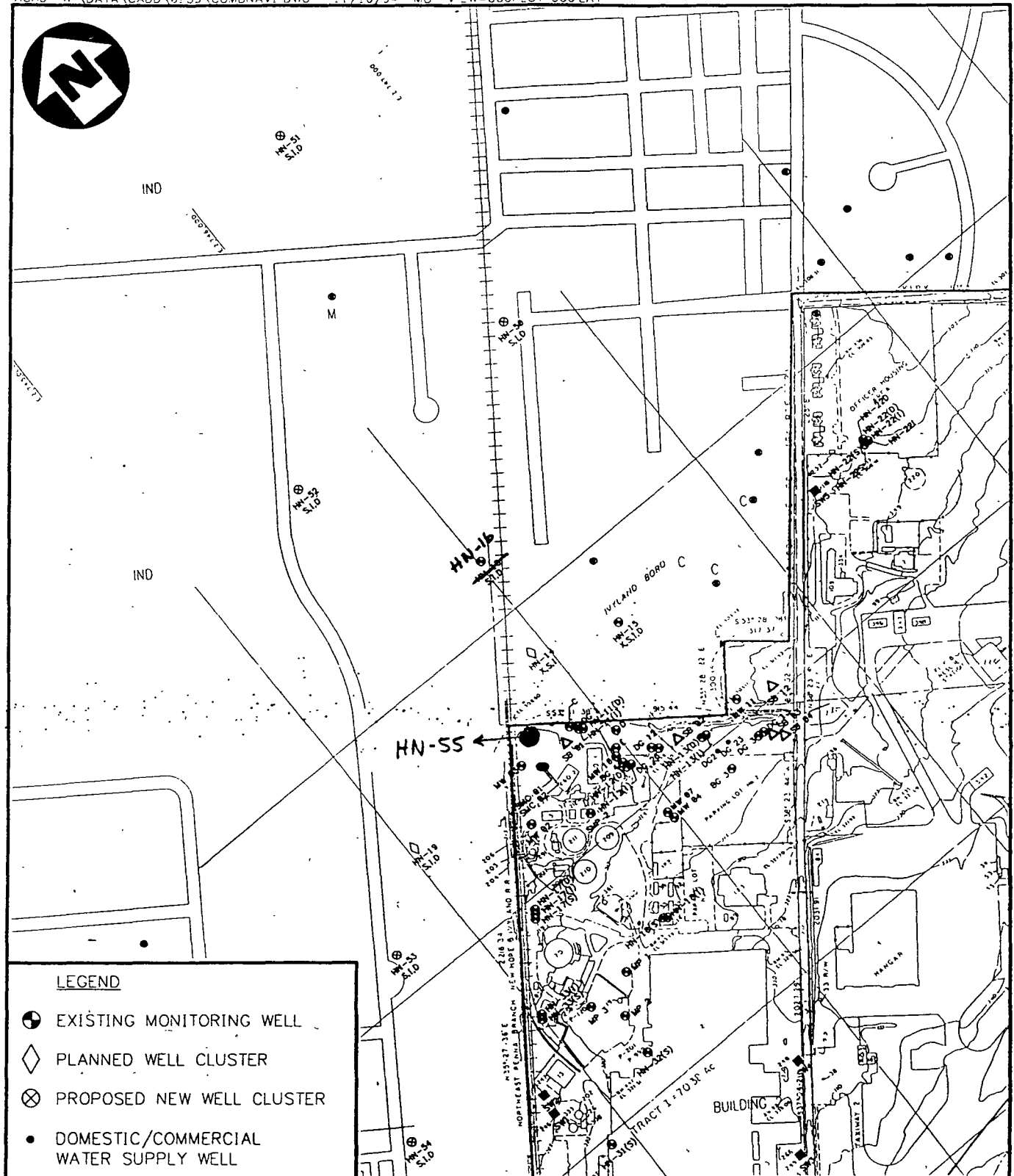


Darius Ostrauskas
Remedial Project Manager

cc: David Kennedy, PADER
Ben Mykijewycz
Bob Lewandowski, NORTHDIV
Brian Nishitani
Kathy Davies

Attachment 2
Letter of April 17, 199

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PROPOSED ADDITIONAL OFFSITE
MONITORING WELL LOCATIONS

NAWC WARMINSTER

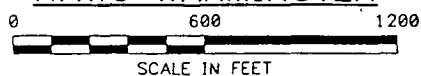


FIGURE 1

 **Halliburton NUS**
Corporation